UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 15 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 6179
RETURN RECEIPT REQUESTED

Mr. Jamie Considine
Vice President of Manufacturing
Switchcraft, Inc.
5555 North Elston Avenue
Chicago, Illinois 60630

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 005 098 389

Dear Mr. Considine:

On August 15, 2014 a representative of the U.S. Environmental Protection Agency inspected the Switchcraft, Inc. (Switchcraft) facility located in Chicago, Illinois. As a "large quantity generator" of hazardous waste, Switchcraft is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Switchcraft's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Switchcraft, EPA's review of records pertaining to Switchcraft, and the inspector's observations, EPA has determined that Switchcraft has unlawfully stored hazardous waste without a permit or interim status as a result of Switchcraft's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Switchcraft was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1 are also independent TSD requirements

This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

At the time of the inspection, Switchcraft did not have a final signed copy from the Treatment, Storage, Disposal Facility of manifests 012540770 JJK (3/6/14) and 010785602 JJK (11/26/2013) on-site.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Ms. Jamie Paulin, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at 312-886-1771, or at Paulin.jamie@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Switchcraft to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

The permit exemption conditions identified below in paragraph 1 are also independent TSD requirements violated by Switchcraft:

1. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

At the time of the inspection, Switchcraft had not provided annual review of this training since 2012.

Summary: By failing to comply with the condition for a permit exemption, above, Switchcraft became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Switchcraft failed to apply for such a permit. Switchcraft's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

Other Violations

2. Hazardous Waste Recordkeeping and Reporting

Under Ill. Admin. Code tit. 35 § 722.140(a), [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Switchcraft, Inc.

EPA ID No.: ILD 005 098 389

LOCATION ADDRESS: 5555 North Elston Avenue
Chicago, Illinois 60630

NAICS CODE(S): 335999 [All other miscellaneous electrical equipment and component manufacturing]

DATE OF INSPECTION: August 15, 2014

EPA INSPECTOR:
Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY:
Jamie L. Paulin
Chemist
3/25/15
Date

APPROVED BY:
Michael Cunningham, Section Chief
Compliance Section 1
RCRA Branch
3/25/15
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the Switchcraft, Inc. (Switchcraft) facility, located at 5555 North Elston Avenue, Chicago, Illinois, to examine Switchcraft's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine Switchcraft's compliance with RCRA, including used oil regulations.

Switchcraft notified as a large quantity generator (LQG) on or about February 27, 1990, and has remained in LQG status. Switchcraft is a manufacturer of connectors, jacks, plugs, cables and switches, which are used in various industries; such as, medical process control and transportation.

Switchcraft employs about 330 people and operates 5 days per week. They have a waste water treatment unit (WWTU) and generate a listed hazardous waste water treatment sludge (EPA hazardous waste number F006). They discharge from the WWTU to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC). They also have an air permit.

OPENING CONFERENCE:

I entered the Switchcraft facility at 10:00 am on August 15, 2013. I introduced myself, presented my credentials, and described the purpose of my visit. I met with Mr. Jamie Considine, Vice President of Manufacturing.

I provided a Small Business Resources Information Sheet to Mr. Considine. He did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

Mr. Considine described the process and operations of Switchcraft during the opening conference. According to Mr. Phillips, Switchcraft manufactures various connectors, switches, jacks, plugs and cables using a plating operation. They operate two plating lines; 1) copper cyanide and 2) nickel acid. The waste from the cyanide line goes through a cyanide destruction process and then is combined with the waste from the nickel acid line for treatment in the WWTU.

After our discussion, we began the physical site inspection immediately following the opening conference.

SITE INSPECTION:

Mr. Considine escorted me on the physical inspection, which began at the F006 hazardous waste collection and storage area. The F006 hazardous waste was being stored in a cubic yard fiber bag.

The bag was closed and labeled with the words, "Hazardous Waste," and with an accumulation start date. *See*, photograph 1.

Mr. Considine showed me the cleaning line, which included, acid baths, base baths, and detergent baths. This area also included a process tank used for buffering. Only nickel and copper are used in this process so the waste is non-hazardous according to Mr. Considine. The acid is neutralized in a tank. *See*, photographs 2 and 3.

We then proceeded to the rinse water area, where the rinse water was being used to rinse parts. Nearby was a closed plastic 55-gallon container and an open plastic container. Both were storing a blue liquid. Mr. Considine explained that this blue material was a BT5 polish that is used to rinse parts and is acidic. Once it can no longer be used, it is put into the WWTU.
See, photograph 5.

Mr. Considine then showed me the hazardous waste storage area. The waste was being stored in 55-gallon containers. There were several containers of used oil, one container of non-hazardous waste and one container of hazardous waste being stored in this area at the time of the inspection. All containers were properly labeled. The hazardous waste container was also dated with an accumulation start date. *See*, photographs 6 and 7.

A grate in the ground was located near the hazardous waste storage area. The inside of the grate appeared to contain some liquid or condensation. The storage area and the grate were located in a three-walled room with a locked fence as the fourth wall. *See*, photographs 8 through 10.

This area was the last to be inspected. We returned to Mr. Considine's office to complete the records review.

RECORDS REVIEW:

Mr. Considine aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

Switchcraft did have a RCRA training program in place via a video that is shown to applicable employees. However, Mr. Considine did state that the training had not been provided since 8/28/2012.

2. Manifests

I reviewed the manifests of the hazardous waste shipments for the years 2012 through 2014. Two final signed manifests were missing from the record; manifests 012540770 JJK 3/26/14 and 010785602 JJK 11/26/2013.

Switchcraft was sending its waste to Heritage Crystal Clean and Evoqua Water Technologies.

3. Waste Analysis and Recordkeeping

I observed that Switchcraft did have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

4. Contingency Plan

A Contingency Plan was available for my review during the inspection and contained all of the elements required under 35 IAC 725.152 [40 CFR § Section 265.52].

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were available for my review during the inspection.

6. Annual Reporting

Switchcraft had filed an annual report with IEPA by March 1 for the reporting years of 2011, 2012 and 2013. They are currently listed as an LQG within the EPA's RCRAInfo database.

7. Weekly and Daily Inspections

Switchcraft was inspecting hazardous waste storage areas weekly and documenting the inspections on a monthly basis.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Considine. I explained to him that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to Switchcraft.

I departed Switchcraft around 2:00pm.

ATTACHMENT: (2)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Inspection Check list

ENCLOSURE: (1)

Photographs for Switchcraft, Inc. CEI 8/15/2014

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0751.JPG
Date/Time 8/15/2014 10:37:00 AM
Photographer Jamie Paulin

Description

Storage of F006 hazardous waste. The material from the cleaning of lines is piped to the Waste Water Treatment Unit (WWTU).

Disk Number 1
Photo Number 2
Photo Filename DSCN0752.JPG
Date/Time 8/15/2014 10:39:00 AM
Photographer Jamie Paulin

Description

Acid baths, Base baths, Detergent baths are part of the Cleaning Line. No metals are part of this part of the process.

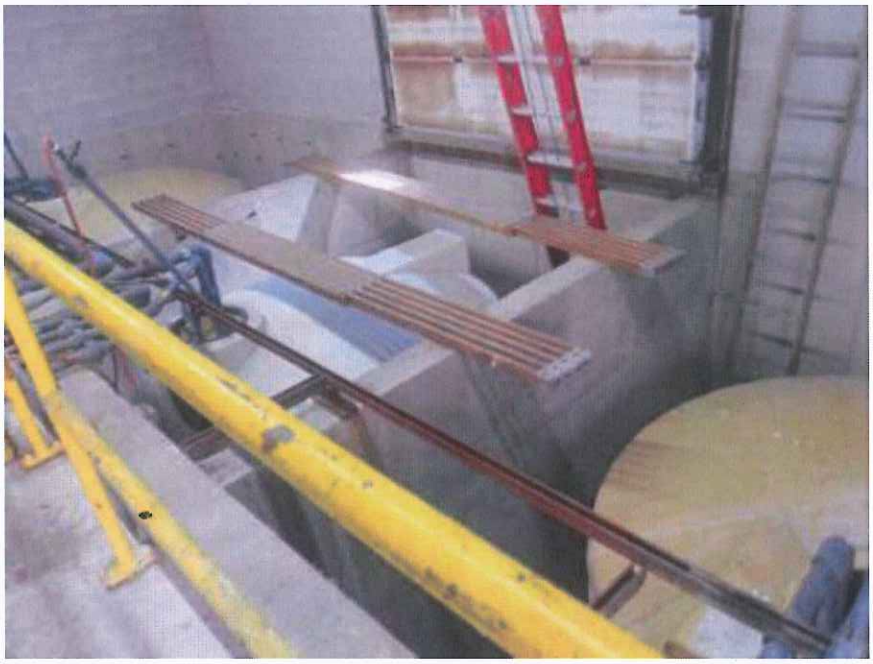
Photographs for Switchcraft, Inc. CEI 8/15/2014

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0753.JPG
Date/Time 8/15/2014 10:45:00 AM
Photographer Jamie Paulin

Description

Process Tank. Buffers are used in this process. Only nickel and copper are used in this process so the waste is non-hazardous. The acid is neutralized in a tank.



Disk Number 1
Photo Number 4
Photo Filename DSCN0754.JPG
Date/Time 8/15/2014 10:46:00 AM
Photographer Jamie Paulin

Description

Rinse water used to rinse parts were located in this area.

Photographs for Switchcraft, Inc. CEI 8/15/2014

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0755.JPG
Date/Time 8/15/2014 10:46:00 AM
Photographer Jamie Paulin

Description

Storage of process chemicals. BT5 Polish is used to rinse parts. It is acidic.

Disk Number 1
Photo Number 6
Photo Filename DSCN0756.JPG
Date/Time 8/15/2014 10:54:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area.

Photographs for Switchcraft, Inc. CEI 8/15/2014

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0757.JPG
Date/Time 8/15/2014 10:54:00 AM
Photographer Jamie Paulin

Description

Used Oil Storage area. No used oill was being stored at the time of the inspection.

Disk Number 1
Photo Number 8
Photo Filename DSCN0758.JPG
Date/Time 8/15/2014 10:54:00 AM
Photographer Jamie Paulin

Description

A grate was located on the floor near the F006 hazardous waste storage. The inside of the grate appeared to contain some liquid.

Photographs for Switchcraft, Inc. CEI 8/15/2014

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0759.JPG
Date/Time 8/15/2014 10:54:00 AM
Photographer Jamie Paulin

Description

A grate was located on the floor near the F006 hazardous waste storage. The inside of the grate appeared to contain some liquid.

Disk Number 1
Photo Number 10
Photo Filename DSCN0760.JPG
Date/Time 8/15/2014 10:55:00 AM
Photographer Jamie Paulin

Description

Overview of the hazardous waste storage area. The storage was kept locked

Switchcraft 8/15/14 ILD 005 098 389

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No ___ N/A ___	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No ___ N/A ___	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No ___ N/A ___	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No ___ N/A ___	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No ___ N/A ___	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No ___ N/A ___	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No ___ N/A ___	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ✓ No ___ N/A ___	722.120(b)
	Section 722.121 Acquisition of Manifests	722.120(d)
	Has the generator used:	
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No ___ N/A ___	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes ✓ No ___ N/A ___	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes ✓ No ___ N/A ___	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No ___ N/A ___	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes ✓ No ___ N/A ___	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___ N/A ___	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes ___ No ✓ N/A ___	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No ___ N/A ___	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes ✓ No ___ N/A ___	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ___ No ___ N/A ✓	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes ✓ No____ N/A____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes ✓ No____ N/A____	722.130
	Section 722.134 Accumulation Time	
(722.134(a))	Has the generator complied with the following requirements: Yes ✓ No____ N/A____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes ✓ No____ N/A____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes____ No____ N/A ✓	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A ✓	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A ✓	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ✓ No____ N/A____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ✓ No____ N/A____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725 Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes N/A No ✓ N/A____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? Yes ✓ No____ N/A____ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes ✓ No____ N/A____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes ✓ No____ N/A____	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes ✓ No____ N/A____	
(725.272)	Is the waste compatible with the container and/or liner? Yes ✓ No____ N/A____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes____ No ✓ N/A____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes_____ No_____ N/A_____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes_____ No_____ N/A_____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes_____ No_____ N/A_____ **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_____ No_____ N/A_____ COMMENTS:	
(725.278)	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes_____ No_____ N/A_____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	725.214
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	
(725.293(c))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes_____ No_____ N/A_____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes_____ No_____ N/A_____ 2) Are welded flanges, joints and connections inspected daily? Yes_____ No_____ N/A_____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes_____ No_____ N/A_____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes_____ No_____ N/A_____	
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____ 2) overfill prevention controls? Yes_____ No_____ N/A_____ 3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
(725.294(c))	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____ 2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____ 3) data from monitoring equipment? Yes_____ No_____ N/A_____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A_____ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
(725.302)	**Section 725.302 Air Emission Standards** Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes✓ No_____ N/A_____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes✓ No_____ N/A_____ b) a telephone or other device to summon emergency assistance from local authorities? Yes✓ No_____ N/A_____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes✓ No_____ N/A_____ d) water at adequate volume and pressure for fire control? Yes✓ No_____ N/A_____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes✓ No_____ N/A_____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes✓ No_____ N/A_____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes✓ No_____ N/A_____	
(725.135)	Is the facility maintaining adequate aisle space? Yes✓ No_____ N/A_____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes✓ No_____ N/A_____ - agreements designating the primary authority where more than one police or fire department might respond? Yes✓ No_____ N/A_____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes✓ No_____ N/A_____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes✓ No_____ N/A_____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes✓ No_____ N/A_____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes✓ No_____ N/A_____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes_____ No_____ N/A✓ If "Yes", has the contingency plan been carried out immediately? Yes_____ No_____ N/A✓	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes✓ No_____ N/A_____ - explosions? Yes✓ No_____ N/A_____ - releases? Yes✓ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes ✓ No____ N/A____ - hospitals? Yes ✓ No____ N/A____ - contractors? Yes ✓ No____ N/A____ - emergency response teams? Yes ✓ No____ N/A____	
(725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No____ N/A____	
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes ✓ No____ N/A____ - capability? Yes ✓ No____ N/A____ - location? Yes ✓ No____ N/A____ Is the list of emergency equipment up-to-date? Yes ✓ No____ N/A____	
(725.152(f))	Does the plan include: - an evacuation plan? Yes ✓ No____ N/A____ - an evacuation signal? Yes ✓ No____ N/A____ - alternate evacuation routes? Yes ✓ No____ N/A____	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes ✓ No____ N/A____ b) submitted to: - police department? Yes ✓ No____ N/A____ - fire department? Yes ✓ No____ N/A____ - hospital? Yes ✓ No____ N/A____ - emergency response teams? Yes ✓ No____ N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes ✓ No____ N/A____ b) the plan fails in an emergency? Yes ✓ No____ N/A____ c) the facility changes in a way that modifies the emergency response necessary? Yes ✓ No____ N/A____ d) information regarding emergency coordinators changes? Yes ✓ No____ N/A____ e) information regarding equipment changes? Yes ✓ No____ N/A____	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes ✓ No____ N/A____ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No____ N/A____ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No____ N/A ✓ **Note:** If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No____ N/A____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No____ N/A____ Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____ - key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____ - communications or alarm systems? Yes ✓ No____ N/A____ - response to fire or explosions? Yes ✓ No____ N/A____ - response to groundwater contamination incidents? Yes ✓ No____ N/A____ - shutdown of operations? Yes ✓ No____ N/A____	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes____ No____ N/A____	
(725.116(c))	Have facility personnel received an annual review of the initial training? Yes____ No ✓ N/A____	Not since 2022
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No____ N/A____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes____ No ✓ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes____ No____ N/A✓ Is the plan on-site? Yes____ No____ N/A✓ Does the plan include a detailed physical and chemical analysis? Yes____ No____ N/A✓ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes____ No____ N/A✓ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes✓ No____ N/A____	
722.134(c)	**Section 722.134 Satellite Accumulation** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes✓ No____ N/A____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes✓ No____ N/A____ If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes✓ No____ N/A____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes✓ No____ N/A____	
722.134(g)	**Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes____ No✓ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A✓	722.140(d)
722.141(a)	**Section 722.141 Annual Reporting** Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes✓ No____ N/A____	
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(b)
	Section 722.142 Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes____ No ✓ N/A____	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes____ No ✓ N/A____	722.142(a)(2)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes____ No ✓ N/A____	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes____ No ✓ N/A____ If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A ✓	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes____ No ✓ N/A____ If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A ✓	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes____ No ✓ N/A____ If "Yes", has the generator complied with the requirements of Subpart G? Yes____ No____ N/A ✓	722.170
	COMMENTS:	

TM:jab\722LQG.doc

US EPA Region 5 Document Log

EPA Inspector:
Jamie L. Paulin

Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained
General	Wastewater Treatment System	Records	8/15/2014	JP-sc-14-01	No	1
General	Facility Site Plan	Records	8/15/2014	JP-sc-14-02	No	1
General	Contingency Plan and ER Procedures	Records	8/15/2014	JP-sc-14-03	No	18
General	Annual Hazardous Waste Report 2012	Records	8/15/2014	JP-sc-14-04	No	11
General	Annual Hazardous Waste Report 2013	Records	8/15/2014	JP-sc-14-05	No	10